

AO 91 (Rev. 08/09) Criminal Complaint

Special Agent : Michael Wiggins

Telephone: 810.239.5775

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America,

Plaintiff,

v.

Tavionne Taveze Boone and
Kieir Marshe Boseman

Case No. 4:21-mj-30388

Judge: Ivy, Curtis

Filed: 08-09-2021

Defendant(s).

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of August 5, 2021, in the county of Genesee
in the Eastern District of Michigan, the defendant(s) violated:

Code Section


21 U.S.C. § 846;
21 U.S.C. § 841(a) & 18 U.S.C. § 2; &
18 U.S.C. § 924(c);

Offense Description

Conspiracy to possess with intent to distribute a controlled substance;
Possession with intent to distribute, & aiding & abetting possession
with intent to distribute, a controlled substance; &
Possession of a firearm in furtherance of a drug trafficking crime.

This criminal complaint is based on these facts:
Please see the attached affidavit.

☒ Continued on the attached sheet.


Complainant's signature

Michael Wiggins, Special Agent-FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: August 9, 2021


Judge's signature

City and state: Bay City, Michigan

Patricia T. Morris, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT
AND ARREST WARRANT

I, Michael S. Wiggins, a Special Agent with the Federal Bureau of Investigation, being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18 of the United States Code. I am empowered to conduct investigations of and to make arrests for offenses enumerated in Title 18 of the United States Code.

2. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI), United States Department of Justice (DOJ), currently assigned to the FBI's Detroit Division, Flint Resident Agency (FLRA). I have been so employed since March 2004. I am currently assigned as the Coordinator and a member of the Northeast Michigan Trafficking and Exploitation Crimes Task Force (NEMTEC) which is a Federal Bureau of Investigation (FBI) managed task force with investigative members assigned from the Michigan State Police (MSP) and FBI. It is tasked with addressing Crimes Against Children and Human Trafficking threats in coordination and cooperation with its local and state partners.

3. As part of my employment, I have received training in and been involved in investigations regarding human trafficking, exploitation of children, drug trafficking, firearms, money laundering, threats, financial crimes, crimes involving gang related activities, child pornography and other violations of federal law.

4. I am conducting an investigation related to violations of the following statutes: 21 U.S.C. § 846 (conspiracy to possess with intent to distribute a controlled substance), 21 U.S.C. § 841(a) and 18 U.S.C. § 2 (possession with intent to distribute, and aiding and abetting possession with intent to distribute, a controlled substance), and 18 U.S.C. § 924(c) (possession of a firearm in furtherance of a drug trafficking crime). Based on the evidence discovered during the course of my investigation, probable cause exists that Tavionne Taveze Boone (DOB XX/XX/1999) and Kieir Marshe Boseman (DOB XX/XX/1998) committed violations of the above statutes within the Eastern District of Michigan.

5. This Affidavit is submitted for the limited purpose of establishing probable cause; this affidavit, therefore, may not include all the information collected during this investigation. This Affidavit is intended to show only that there is sufficient probable cause for the requested complaint and warrant and does not set forth all of my knowledge about this matter. The information contained in this

affidavit is based on personal knowledge, on reports made to me by other law enforcement officers, my training and experience, and the combined knowledge, training, and experience of other law enforcement officers and agents with whom I have had discussions.

PROBABLE CAUSE

6. On August 5, 2021, Michigan State Police (MSP) Troopers conducted a traffic stop of a red Chevrolet Impala bearing Michigan registration plate EKZ7988. The traffic stop took place in Genesee County, Michigan, which is in the Eastern District of Michigan. The vehicle was driven by Boone, and Boseman was the front seat passenger. A third identified individual was located in the rear seat of the vehicle. The vehicle was registered to Boseman.

7. After approaching the front, passenger-side window to make contact with Boseman while she was seated in the vehicle, Trooper Travis Fountain observed a pistol in a purse next to her. During a subsequent search of the vehicle, the pistol observed by Trooper Fountain was determined to be a Fabrique Nationale, Model FN 509, 9mm caliber, semiautomatic pistol. A magazine containing 23 rounds of 9 mm ammunition was located in the pistol.

8. Also during the search of the vehicle Trooper Brett Sowers located a Smith and Wesson, Model SW40VE, .40 caliber, semiautomatic pistol under the

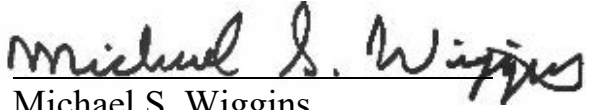
driver's seat. An extended magazine was located in the pistol which contained 32 rounds of .40 caliber ammunition. An additional unloaded magazine was found in the pocket on the back side of the driver's seat. Trooper Sowers also located approximately 10.4 grams of suspected crack cocaine in a black fanny pack on the front passenger floorboard. The suspected crack cocaine was divided into nine corner-tied bags and a larger bag containing four larger pieces of suspected crack cocaine. A loose razor blade was also located inside the black fanny pack.

9. A field test was conducted on the suspected crack cocaine which returned a positive result for the presence of cocaine base. Cocaine base is a Schedule II controlled substance. Based on my training and experience, the manner in which the crack cocaine was packaged indicates it was intended for distribution. Users of crack cocaine usually possess much smaller amounts, typically less than one gram. The crack cocaine located in the fanny pack weighed approximately 10.4 grams. In addition, no other paraphernalia consistent with drug use was located in the vehicle.


CONCLUSION

10. Based on the aforementioned fact, there is probable cause to believe that Tavionne Taveze Boone and Kieir Marshe Boseman committed violations of 21 U.S.C. § 846 (conspiracy to possess with intent to distribute a controlled substance), 21 U.S.C. § 841(a) and 18 U.S.C. § 2 (possession with intent to distribute, and aiding

and abetting possession with intent to distribute, a controlled substance), and 18 U.S.C. § 924(c) (possession of a firearm in furtherance of a drug trafficking crime), within the Eastern District of Michigan.


Michael S. Wiggins
Special Agent

Sworn to before me and signed in my presence
and/or by reliable electronic means on August 9, 2021.


Hon. Patricia T. Morris
United States Magistrate Judge